

Before the
Federal Communications Commission
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| |) | |
| Telecommunications Relay Services |) | CG Docket No. 03-123 |
| and |) | |
| Speech-to-Speech Services for |) | |
| Individuals with Hearing and Speech |) | |
| Disabilities |) | |
| Petition for Clarification on Spanish | | |
| VRS by Communication Service for the | | |
| Deaf | | |

Comments of Communication Access Center
for the Deaf and Hard of Hearing
on the Petition for Clarification by Communication Services for the Deaf

Communication Access Center for the Deaf and Hard of Hearing (CAC) hereby respectfully submits these comments to the Federal Communications Commission (FCC or Commission) on the Petition for Clarification on Spanish VRS submitted by Communication Services for the Deaf (CSD) seeking clarification that as a non-mandated service, the provision of ASL-to-Spanish non-shared language translation video relay service (VRS) is not required twenty-four hours per day, seven days per week. In general, CAC agrees with CSD that ASL to Spanish VRS should not be mandated 24/7. We believe the Spanish Deaf Community would be better served at

this time by allowing providers to increase service during peak calling hours and decrease service during off peak calling hours.

Our experience with providing ASL to Spanish VRS has also been that outside of peak calling hours, the demand for ASL to Spanish VRS, at this point in time, is very low and in some cases non-existent. ASL to Spanish VRS has a higher cost of provision than shared language VRS even during peak calling hours because it is a tri-lingual service and requires CAs with an additional language skill. This higher cost mandates a higher volume of calls just to recover provider costs. Outside peak calling hours, our costs are rarely recovered.

As currently implemented, the FCC rules require ASL to Spanish VRS be provided 24/7 if the provider is going to offer Spanish VRS. At some point in the very near future, this may force CAC, and possibly other providers, to discontinue the service all together rather than use ASL VRS to subsidize the operation of ASL to Spanish VRS during off peak calling hours. We believe that this would be a disservice to the growing Spanish deaf population at this time.

It is difficult to find interpreters who are qualified in both ASL and Spanish. The current rules requiring service 24/7 necessitate an even larger number of qualified tri-lingual interpreters to cover all shifts on all days. It has been CAC's experience that we must schedule fewer interpreters during peak hours so that all hours can be covered. This means that interpreters are scheduled to meet the 24/7 requirement instead of being scheduled based on call volume during peak calling hours. This

may reduce the level of service to Spanish speaking callers during peak calling hours.

Therefore, CAC supports the CSD request for clarification that ASL to Spanish non-shared language translation video relay service (VRS), a non-mandated relay service, not be required twenty-four hours per day, seven days per week.

Respectfully submitted,

Julie A. Miron, CAE
Executive Director

Communications Access Center for the
Deaf and Hard of Hearing
1631 Miller Road
Flint, Michigan 49503
810-239-3112